

JULIEN, MIRER, SINGLA & GOLDSTEIN, PLLC

ATTORNEYS AT LAW
1 WHITEHALL STREET 16TH FLOOR
NEW YORK, NEW YORK 10038

JEANNE MIRER
SETH GOLDSTEIN

TELEPHONE: (212) 231-2235
FACSIMILE: (646) 219-0946

RIA JULIEN
RETU SINGLA

April 11, 2024

By ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court for the Eastern District of NY
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Sylla et al., v. Amazon Labor Union et al.
Civil Case No. 23- 05261 (AMD)

Dear Magistrate Merkl:

I am writing on behalf of the Defendant Amazon Labor Union to request that all parties have a conference with the Court as soon as possible to address the Court's position with respect to the four workers who filed pro se intervention petitions. As this Court is aware the Amazon Labor Union opposed to proposed intervention by Ms. Valentin-Nieves. However, when we received the proposed intervention letters from the three other persons, we asked the Court to schedule a meeting of all parties so we could address how these intervention petitions impact the current consent Order. We asked for this meeting precisely because the Court asked the parties to address how the Court and or the ALU should address the concerns raised by the intervenors. It appears to us that addressing the concerns of the intervenors will impact the Consent Order.

For example, Proposed Intervenor Boone reminded us that the constitution does not permit an officer election until after a collective bargaining agreement is signed so raising the specter that any election scheduled before there is an agreement could be challenged under Title I of the LMRDA. More particularly Defendants are concerned that our agreement to hold an election before July 31, 2024 which violates the constitution makes the election subject to being enjoined, at the same time if we follow the constitution, we would be in violation of the Consent Order.

Other parts of the Consent order and its implementation are dependent in large measure on how the court rules on these petitions to intervene.

Respectfully submitted,

/s/

Jeanne Mirer

Cc: Arthur Schwartz